

**U.S. Environmental Protection Agency
Scientific Integrity Program**

Inquiry Report and Determination for Allegation 21.01

Background on scientific integrity

The U.S. Environmental Protection Agency (EPA) is dedicated to preserving the integrity of the scientific and scholarly activities it conducts and that are conducted on its behalf. The EPA Scientific Integrity Policy,¹ dated February 2012, provides principles and standards to ensure scientific integrity in the conduct, use, and communication of science. When this policy is not adhered to, or is circumvented, the robustness of EPA science and the trust in the results of our scientific work can be impacted, causing a loss of scientific integrity. Loss of scientific integrity is the result of a deliberate action by an employee that compromises the conduct, production, use of scientific and scholarly activities and assessments. EPA strives to prevent loss of integrity in the performance of scientific and scholarly activities or in the application of science in its decision making.

Allegations of the loss of scientific or scholarly integrity are submitted to the EPA's Scientific Integrity Official (ScIO). Three criteria are considered when establishing a loss of scientific integrity:

- a. There is a significant departure from accepted practices or established procedures;
- b. The actions causing the loss of integrity are committed intentionally, knowingly or recklessly; and,
- c. The allegation is proven by a preponderance of evidence.

When the Scientific Integrity Program finds a violation, it issues recommendations to safeguard the science. When it finds no violations but believes it can assist the participants in advancing scientific integrity considerations, the Scientific Integrity Program provides advice.

Origin of this report

The Scientific Integrity Official launched the inquiry that is the subject of this report in response to a Differing Scientific Opinion (DSO) that was submitted to the Scientific Integrity Program on November 25, 2020. This DSO was submitted by a group of scientists within the Office of Chemical Safety and Pollution Prevention (OCSPP) and was in reference to an internal OCSPP draft document titled "Interim Science Approach on the Evaluation of Lung Overload for Insoluble, Non-Reactive, Respirable Polymers."

EPA released "Approaches for Expressing and Resolving Differing Scientific Opinions"² on October 8, 2020. This document outlines a series of progressive approaches that employees and managers can use to encourage the expression and resolution of DSOs. Typically, the filing of a DSO is not considered an

¹ https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf

² https://www.epa.gov/sites/production/files/2020-10/documents/epas_approaches_for_expressing_and_resolving_differing_scientific_opinions.pdf

allegation of a lapse in scientific integrity as a DSO is recognized and encouraged as a “legitimate and necessary part of the scientific process.”³ However, two authors of this DSO alleged that their concerns had not been adequately acknowledged by OCSPP management and, therefore, the Scientific Integrity Program launched this inquiry.

Method of inquiry

The Deputy Scientific Integrity Official (DScIO) for OCSPP led the investigation into this inquiry. The DScIO convened a series of meetings with the authors of the DSO and with OCSPP management to discuss the DSO and this allegation.

Determination and Recommendations

OCSPP management acknowledged that the processes outlined in EPA’s “Approaches for Expressing and Resolving Differing Scientific Opinions” had not been adequately applied in relation to this DSO. As such, this allegation is substantiated. OCSPP management has withdrawn the draft document that was the subject of the DSO and has agreed to apply the processes described in “Approaches for Expressing and Resolving Differing Scientific Opinions” to this and any future DSOs.

Summary for Annual Report

A Differing Scientific Opinion (DSO) was submitted by a group of scientists in a Program Office. Typically, the submission of a DSO is not considered an allegation of a lapse in scientific integrity as a DSO is a legitimate part of the scientific process. However, two of the authors of this DSO alleged that their concerns had not been adequately considered by their Program Office management.

Summary: The Program Office management acknowledged that the processes outlined in EPA’s “Approaches for Expressing and Resolving Differing Scientific Opinions” had not been adequately applied in relation to this DSO; therefore, this allegation is substantiated. The Program Office has agreed to apply the processes described in “Approaches for Expressing and Resolving Differing Scientific Opinions” to this and any future DSOs.

³ https://www.epa.gov/sites/production/files/2020-10/documents/epas_approaches_for_expressing_and_resolving_differing_scientific_opinions.pdf